REMARKS

The enclosed is responsive to the Examiner's Office Action mailed on November 11, 2004. At the time the Examiner mailed the Office Action claims 1-18 were pending. By way of the present response the Applicants have: 1) amended claims 1-4, 6, 7, 10, 12 and 14; 2) added new claims 19-28; and 3) canceled ~~claims~~ no claims. As such, claims 1-28 are now pending. The Applicants respectfully request reconsideration of the present application and the allowance of all claims now presented.

35 U.S.C. 112 Rejections

In the office action, the Examiner rejected Claim 3 under 35 USC § 112. Specifically, the examiner stated that "[t]he term 'substantially' in claim 3 is a relative term which renders the claim indefinite." Applicants have removed the term substantially from Claim 3 and therefore respectfully request withdrawal of the § 112 rejection.

35 U.S.C. 103(a) Rejections

The Examiner rejected claims 1-6, 10, 12, and 14 under 35 U.S.C. 103(a) as being unpatentable over Witteman, U.S. Publication 2002/0055950 A1, 5/9/02 (filed 4/23/01, continuation of application filed 12/23/98) (hereinafter "Witteman"). In particular, the Examiner stated that Figure 3 of Witteman and various portions of associated text (i.e., page 1, paragraphs 5-9; page 2, paragraphs 27-29; and page 3, paragraph 32) render Claim 1 obvious under 35 U.S.C. 103(a).

Figure 3 of Witteman shows a process in which audio and text are separated from a signal (e.g., a television signal) and subsequently synchronized and cataloged within an information store (e.g., a hard drive). See, e.g., Witteman, Paragraph [0032]. Synchronization between the audio and text is achieved by concurrently (1) performing a dictionary lookup of keywords within the text and (2) performing speech recognition of speech within the audio. As described in Witteman:

> The text feed is compared to a dictionary of key words and phrases (step 416). When a keyword or phrase is found, the keyword or the phrase is sent to a speech recognizer (step 418). The speech recognizer then searches recent audio feeds for the same keyword or phrase (step 420). Witteman, Paragraph [0031]

Once the phrase is identified, "the information store synchronizes the catalogs audio and text blocks (step 426)." Witteman, Paragraph [0032]. The underlying purpose of the process shown in Figure 3 is to provide "synchronized audio and text streams, even if the original audio and text (closed-caption) information were originally out of synch." Witteman, Paragraph [0034].

Applicant respectfully submits that the foregoing process is significantly different from the embodiments of the invention claimed herein. In particular, Witteman does not teach or suggest several features recited in Claim 1. First, Witteman does not teach or suggest assigning a different number to each of a plurality of words in a text sequence, as recited in Claim 1. Rather, Witteman performs a dictionary lookup to identify keywords and phrases within a text stream and then performs speech recognition to identify portions of audio content which contain those keywords and phrases.

In addition, Witteman does not teach or suggest synchronizing an audio data group to a nearest time mark within a series of time marks spaced according to a predefined temporal arrangement as recited in Claim 1. No particular temporal arrangement is suggested in Witteman for synchronizing audio data groups. Rather, in Witteman, audio information is merely synchronized with text information following speech recognition. Accordingly, Applicant respectfully submits that Claim1 is allowable over Witteman.

Finally, Witteman does not teach or suggest associating an audio data group to a number of a word in a text sequence corresponding to audio content contained within the audio data group, as recited in Claim 1. As mention above, in Witteman, audio sequences are associated directly with the actual words of the text sequence following speech recognition. Applicant respectfully submits that any one of the foregoing features recited in Claim 1 render Claim 1 allowable over Witteman.

Claims 10, 12 and 14 also include the features of (1) assigning a different number to each of a plurality of words in a text sequence; (2) synchronizing an audio data group to a nearest time mark within a series of time marks spaced according to a predefined temporal arrangement; and (3) associating an audio data group to a number of a word in a text sequence corresponding to audio content contained within the audio data group. As such, Applicant submits that these claims are allowable over Witteman for all of the reasons stated above with respect to Claim 1.

Claim 14 claims a multimedia system which includes a processor to divide audio data into a plurality of audio data groups, and to synchronize a current audio data group of said plurality of audio data groups to a nearest time mark within a series of time marks spaced according to a predefined temporal arrangement; and a correlator to associate the current audio data group to an assigned number of a word in text data, the word corresponding to audio content contained within the current audio data group. As described above, Witteman does not teach or suggest synchronizing an audio data group to a nearest time mark within a series of time marks spaced according to a predefined temporal arrangement; nor does Witteman teach or suggest associating the current audio data group to an assigned number of a word in text data, where the word corresponds to audio content contained within the current audio data group. Rather, Witteman merely teaches an implementation for synchronizing audio with text data using speech recognition and keyword searches. As such, Applicant submits that Claim 14 is in condition for allowance.

The Examiner also rejected claims 7-9, 11, 13 and 15-18 under 35 U.S.C. 103(a) as being unpatentable over Witteman, U.S. Publication 2002/0055950 A1, 5/9/02 (filed 4/23/01, continuation of application filed 12/23/98) (hereinafter "Witteman") in view of Ishii, U.S. Patent 6,778,493 (hereinafter "Ishii"). Ishii describes a system for synchronizing packetized multimedia data by inserting "total delay information" into the multimedia data packets. However, Ishii does not teach or suggest several features recited in Claim 7, including (but not limited to): (1) assigning a different number to each of a plurality of words in a text

sequence; (2) synchronizing an audio data group to a nearest time mark within a series of time marks spaced according to a predefined temporal arrangement; or (3) associating an audio data group to a number of a word in a text sequence corresponding to audio content contained within the audio data group. Thus, Applicant respectfully submits that Claim 7 is allowable over Witteman in view of Ishii.

The remaining pending claims, including new claims 19-28 depend from the independent claims discussed above and include additional features. Accordingly, Applicant submits that these claims are also in condition for allowance under 35 USC § 103.

CONCLUSION

Applicant respectfully submits that all rejections have been overcome and that all pending claims are in condition for allowance. If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Thomas C. Webster at (408) 720-8300.

Respectfully Submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: _t /7_____, 2004

Thomas C. Webster
Reg. No.: 46,154

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300

App. No.: 09/909,543   -16-   Atty. Docket No.: 3442.P014
Amdt. dated January 7, 2005
Reply to Office action of November 3, 2004